

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: E. I. DU PONT DE NEMOURS AND  
COMPANY C-8 PERSONAL INJURY  
LITIGATION

CASE NO. 2:13-MD-2433

JUDGE EDMUND A. SARGUS, JR.

**This document relates to:**

MAGISTRATE JUDGE ELIZABETH P.  
DEAVERS

*Bartlett v. E. I. du Pont de Nemours and  
Company*, Case No. 2:13-CV-0170

*Wolf v. E. I. du Pont de Nemours and  
Company*, Case No. 2:14-CV-0095

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**DEFENDANT'S NOTICE OF FILING ADJUSTED  
CITATIONS TO DEPOSITION TRANSCRIPTS**

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Defendant E. I. du Pont de Nemours and Company ("DuPont") respectfully submits adjusted citations to the deposition transcripts of certain of Plaintiffs' experts, in support of DuPont's *Daubert* Motions and Motions for Summary Judgment filed on April 6, 2015. As noted in those motions, the final transcripts for the depositions of Dr. Robert Gross, Dr. Vitaly Margulis, Mr. Stephen Petty, and Mr. Steven Amter were not available prior to the April 6, 2015 summary judgment and *Daubert* deadline.<sup>1</sup> Accordingly, the citations to the testimony of those experts in DuPont's motions are to the rough transcripts provided by the court reporters following the depositions. Now that final transcripts have been received, DuPont has prepared the following adjusted citations for its motions:

- Adjusted Citations for DuPont's Overview Brief on Causation Issues [ECF No. 2813], attached as Exhibit A;

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<sup>1</sup> The final transcripts have been filed by Plaintiffs at ECF No. 3066.

- Adjusted Citations for DuPont's Motion for Partial Summary Judgment on Trial Plaintiff Carla Bartlett's Fraud and Emotional Distress Claims [ECF No. 2815], attached as Exhibit B;
- Adjusted Citations for DuPont's Motion for Summary Judgment on the Individual Claims of Trial Plaintiff John Wolf Based on Specific Causation [ECF No. 2817], attached as Exhibit C;
- Adjusted Citations for DuPont's Motion to Exclude the Testimony of Trial Plaintiffs' Corporate Conduct Experts: Stephen Petty, Steven Amter, Barry Levy, and Michael Siegel [ECF No. 2819], attached as Exhibit D;
- Adjusted Citations for DuPont's Motion to Exclude the Testimony of Trial Plaintiffs' Specific Causation Experts: Dr. Robert Bahnson, Dr. Vitaly Margulis, and Dr. Robert Gross [ECF No. 2823], attached as Exhibit E;
- Adjusted Citations for DuPont's Motion for Partial Summary Judgment on Punitive Damages in the Bartlett and Wolf Cases [ECF No. 2828], attached as Exhibit F.

Respectfully submitted,

/s/ Damond R. Mace

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Defendant E. I. du Pont de Nemours and Company's Notice of Filing Adjusted Citations to Deposition Transcripts was electronically filed with this Court's CM/ECF system on May 6, 2015 and thus served automatically upon all counsel of record for this matter.

*s/ Damond R. Mace*

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